
**IN THE COURT OF APPEALS FOR THE 5TH JUDICIAL DISTRICT OF
TEXAS AT DALLAS: 05-21-00242, 05-21-00373, 05-21-00360**
**ON APPEAL FROM THE 366TH JUDICIAL DISTRICT COURT COLLIN
COUNTY, TEXAS TRIAL COURT CAUSE NOS. 366-53554-2020,
366-51795-2021, AND 366-50778-2021**

AMENDED RESPONSE: ISSUES FOR APPEAL

05-21-00242

PART I: DISSOLUTION OF MARRIAGE

A. THE MATTER OF THE MARRIAGE (1) Did the trial court misapply the law when it found that no informal marriage existed based on the agreement prong; and (2) Did the trial court err when it denied/declined to hear Appellant's claims to putative spousal rights?

B. CASE DISMISSED (1) Did the trial court err when it dismissed the divorce and determined the informal marriage did not exist; and (2) did the trial court have jurisdiction to make subsequent rulings after it dismissed the divorce suit?

05-21-00242

PART II – SUIT AFFECTING PARENT-CHILD RELATIONSHIP

A. PREJUDICED AND DUE PROCESSLESS – (1) Did the failure to serve requests for change in conservatorship on two different occasions violate

Appellant's due process rights; and (2) was the trial court prejudiced by Appellee's ex parte pleadings for change in conservatorship?

B. PARENTAL RIGHTS - (1) Were Appellant's parental rights de facto terminated when her visitation was restricted to a non-operational/non-enforceable visitation site, (2) when her visitation was conditioned on Appellee's approval, or (3) when precedent conditions were unaffordable and unperformable?

C. EQUAL PROTECTION (1) Was Appellant deprived of equal protection rights when she had to fight pro se for her parental rights against Appellee when he had three attorneys representing him; and (2) did Appellant, MCM, and MAM receive equal protection of law when they were denied the same procedural safeguards provided in suits affecting the parent-child relationship filed by government entities?

D. INEFFECTIVE ASSISTANCE OF COUNSEL – (1) Did Appellant, MCM, and MAM lose substantive rights because of ineffective assistance of counsel; (2) did the trial court err when it denied attorney's fees and/or

sanctions; and (3) should the trial court have appointed counsel for Appellant and/or the children?

05-21-00373

**APPELLEE'S PROTECTIVE ORDER AND PROTECTION FROM THE
2ND AMENDMENT**

(1) Did the trial court err when it granted Appellee a protective order against Appellant; (2) did Appellee's right to bear arms take precedent over Appellant's right to protection; (3) did the trial court err when it entered an internally conflicting protective order and (4) were Appellee's claims barred by res judicata?

05-21-00360

VEXATIOUS LITIGANT DESIGNATION

(1) Is the vexatious litigant statute facially invalid? (2) Is the vexatious litigant statute invalid as applied in this present case? (3) Did the trial court err when designating Appellant a vexatious litigant without allowing evidence submissions and arguments? (4) Did the vexatious litigant law violate Appellant's substantive rights when it infringed upon her parental rights and rights to appeal?

How can legal semantics sold to the highest bidder in a contentious divorce/custody suit ever justify unnecessary trauma from deprivation of the parent-child relationship? This is a Human Rights Issue.

Respectfully submitted,

/s/ Molly Wilkerson

Molly Wilkerson /Pro se

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Cc: Julia Pendery, via e-service

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